

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-vs-

NOTICE OF

MOTION

JOHNNY WILLIAMS
Defendant.

Docket No: 21- cr-00195

MOTION BY:

Frank M. Bogulski as attorney for
Defendant Johnny Williams

DATE, TIME & PLACE:

Before Hon. Michael J. Roemer United States District
Court, 2 Niagara Square Buffalo, NY on a date and
time convenient to the Court.

SUPPORTING PAPERS:

Affirmation of Frank M. Bogulski,
Dated September 1st, 2022

RELIEF REQUESTED:

Motion for extension of time to file pretrial
motions

DATED:

Buffalo, New York
September 1st, 2022

/s/FRANKM.BOGULSKI

FRANK M. BOGULSKI Attorney
for Defendant,
Johnny Williams
135 Delaware Avenue, Suite2
Buffalo, New York 14202
(716) 649-0090

TO: Nicholas Cooper
Assistant United States
Attorney

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-vs-

AFFIRMATION

JOHNNY WILLIAMS

Defendant.

FRANK M. BOGULSKI, ESQ., an attorney licensed to practice law in New York State and the Western District of New York, declares the following under penalty of perjury:

1. I represent the Defendant, Johnny Williams, in the above-entitled action brought by the United States of America.
2. I was recently retained to represent Johnny Williams in connection with charges pending in this court. Mr. Williams brings this motion to request an adjournment of the timeframe in which to submit pretrial motions.
3. After being recently retained, I notified Mr. Williams' previous attorney, James Aurricchio, that I needed to have access to the file. As of today, I have not received the file and require additional time to file pretrial motions.
4. Upon information and belief pretrial motions have not been filed by Mr. Auricchio.
5. I have had the opportunity to speak with Assistant United States Attorney, Nicholas Cooper, and he does not consent to this extension.
6. It is clear and obvious that an adjournment in this matter is necessary to facilitate effective assistance of counsel.
7. It is my understanding that a trial date has been set; however, in the interest of justice Mr. Williams requires an adjournment. At this time, he does not anticipate requesting a new

trial date as we believe there is ample time between now and the upcoming trial to litigate any matters.

WHEREFORE, Defendant Johnny Williams requests a forty-five (45) day extension of time to review discovery, continue discussions, and to file pretrial motions.

Dated: Buffalo, NY
September 1st, 2022

/s/ Frank M. Bogulski
FRANK M. BOGULSKI
Attorney for Defendant
Johnny Williams
135 Delaware Avenue, Suite 2
Buffalo, New York 14202
(716) 649-0090